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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUL 06 2022

SEAN F. McAVOY, CLERK
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SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANNIE PAUL BOWLING, III,

Defendant.

2:22-CR-80-TOR

INDICTMENT

Vio.: 18 U.S.C. § 1591(a)(1), (b)(2)
Child Sex Trafficking
(Count 1)

18 U.S.C. § 2251(a), (e)
Production and Attempted
Production of Child Pornography
(Count 2)

18 U.S.C. §§ 1594, 2253
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Between on or about June 1, 2021, and on or about March 16, 2022, in the Eastern District of Washington, the Defendant, DANNIE PAUL BOWLING, III, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means Minor Victim 1, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe Minor Victim 1, that Minor Victim 1 had attained the age of 14 years but had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1), (b)(2).

COUNT 2

Between on or about June 1, 2021, and on or about April 26, 2022, in the Eastern District of Washington, the Defendant, DANNIE PAUL BOWLING, III, did knowingly employ, use, persuade, induce, entice, and coerce Minor Victim 1, a minor girl, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transmitted using any means and facility of interstate commerce, namely the Internet, and such visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and did attempt the same, all in violation of 18 U.S.C. § 2251(a), (e).

NOTICE OF FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of 18 U.S.C. § 1591(a)(1), (b)(2), as charged in this Indictment, the Defendant, DANNIE PAUL BOWLING, III, shall forfeit to the United States of America, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense, including, but not limited to:

- a Samsung Galaxy A51 5G, IMEI 359419580391406;
- a red and gray SanDisk Ultra 64 gigabyte micro SD card; and
- a white multi-outlet with a pinhole camera and two USB chargers.

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C. § 2251(a), (e), as charged in this Indictment, the Defendant, DANNIE PAUL BOWLING, III, shall forfeit to the United States any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book,

1 magazine, periodical, film, videotape, or other matter which contains any such visual
2 depiction, which was produced, transported, mailed, shipped or received in violation
3 of this chapter; any property, real or personal, constituting or traceable to gross
4 profits or other proceeds obtained from such offense; and, any property, real or
5 personal, used or intended to be used to commit or to promote the commission of
6 such offense, or any property traceable to such property, including, but not limited to:

- 7 - a Samsung Galaxy A51 5G, IMEI 359419580391406;
- 8 - a red and gray SanDisk Ultra 64 gigabyte micro SD card; and
- 9 - a white multi-outlet with a pinhole camera and two USB chargers.


10 If any such property, as a result of any act or omission of the Defendant:

- 11 a. cannot be located upon the exercise of due diligence;
- 12 b. has been transferred or sold to, or deposited with, a third party;
- 13 c. has been placed beyond the jurisdiction of the court;
- 14 d. has been substantially diminished in value; or
- 15 e. has been commingled with other property which cannot be
16 divided without difficulty,

17 the United States of America shall be entitled to forfeiture of substitute property
18 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

19 DATED this 6 day of July, 2022.

20 A TRUE BILL

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